

Dear Department of Ecology,

I am concerned about the increasing levels of persistent toxic chemicals, such as mercury, dioxin, and flame retardants, found in our bodies and the environment and urge you to issue a strong rule for the Persistent Bioaccumulative Toxics (PBT) Program.

Thank you for making changes to the rule to include several additional chemicals, including phthalates, on the list of chemicals to be phased out. Phthalates were recently linked to reproductive problems in male infants and are found in many everyday consumer products, including cosmetics and children's toys.

There are, however, several areas where the rule still must be strengthened if we are to achieve Washington state's goal of eliminating persistent toxic chemicals.

Specifically, the rule should:

1. Include metals that are classified as PBTs, such as lead, on the list of chemicals to be phased out. Numerous scientific studies show that lead bioaccumulates in our bodies and causes learning, behavioral, and intelligence problems in children.
2. Include the toxic flame retardant, deca-BDE, on the list of chemicals to be phased out. Deca breaks down into more toxic forms of PBDEs that have been shown to affect memory, learning, and behavior in laboratory animals at very low levels.
3. Ensure that the goal of the PBT Program and phaseout plan (or chemical action plan) is to eliminate the uses and releases of a chemical.
4. Require that each phaseout plan study and recommend safer substitutes to using the chemical and also include clear timelines for completion of the plan.

Sincerely